



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

February 7, 2005

FED EX

James C. Morriss III
Thompson & Knight LLP
1900 San Jacinto Center
98 San Jacinto Boulevard
Austin, Texas 78701-4081

RE: Gulfco Marine Maintenance Superfund Site in Freeport Texas

Dear Mr. Morriss:

This letter is in response to the negotiations that the Environmental Protection Agency (EPA) has had with the Gulfco Potentially Responsible Party Group (Gulfco PRP Group) (consisting of Sequa Corporation, LDL Coastal LP, and Dow Chemical Company) regarding conducting a Remedial Investigation and Feasibility Study at the Gulfco Marine Maintenance Superfund Site (Gulfco Site) through an Administrative Order on Consent (AOC) and Statement of Work (SOW).

EPA has considered the issues raised and the changes recommended by the PRP Group and has revised the AOC. EPA is enclosing two versions of the revised AOC. The first is a marked up version of the AOC showing our latest changes in redline/strikeout. The second version is a clean copy for signature. EPA has considered the issues raised and the changes recommended for the SOW and decided to make no changes. EPA has enclosed a clean copy of the SOW. Parties who wish to participate in the settlement must return their completed signature pages to me by close of business on February 16, 2005.

If you have any questions or comments, please contact me at (214) 665-2157.

Sincerely,

A handwritten signature in black ink that reads "Barbara A. Nann".

Barbara A. Nann
Assistant Regional Counsel

Enclosures

cc: Bill Mailey
Alan Daniels

947885

